



16711
15 April 1998

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: POLICY GUIDANCE ON MAJOR CONVERSION DETERMINATIONS FOR
LIFTBOATS

Ref: (a) 46 USC 2101(14A)
(b) COMDT (G-MOC-2) memorandum 16711 of 30 July 1996
(c) MSC ltr 16715/P004309, Serial H1-9800738 of 11 March 1998
(d) COMDT (G-MOC) ltr 16703/A/46-125.100 of 20 November 1996
(e) NVIC 10-81, Change 1

1. Recently members of the offshore supply vessel (OSV) liftboat community expressed concern regarding perceived inconsistencies in Coast Guard "major conversion" determinations for liftboats undergoing structural and/or equipment modifications. This letter clarifies Coast Guard policy regarding major conversion determinations as discussed with industry representatives on 12 March 1998.

2. Reference (a) provides the statutory definition of "major conversion." Reference (b) is a memorandum from Commandant (G-MOC-2) to the Marine Safety Center (MSC) Project Officer acknowledging the transfer of responsibility for making "major conversion" determinations to the MSC. Thus, final determinations regarding whether a specific vessel modification constitutes a major conversion rests with the Commanding Officer, MSC.

3. In reference (c), MSC described several recent major conversion determinations regarding liftboats which specifically relate to liftboat industry concerns expressed during our conversations. The following guidance is provided to clarify Coast Guard policy.

The addition of port and starboard sponsons which increased the vessel's beam by 45% was held to be a **major** conversion. This decision is consistent with reference (a), which defines a major conversion as any conversion that substantially changes the dimensions of the vessel. Consequently, changes such as addition of sponsons or a midbody will normally result in a major modification determination.

A simultaneous crane modification and quarters modification was held to be a **minor** modification

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The addition of a third deck to the vessel's quarters was held to be a **minor** modification.

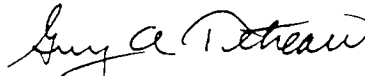
Lengthening of legs is generally not considered a major conversion unless the addition of sponsons is necessary to meet stability requirements.

Enlargement of accommodation/quarters spaces alone has not normally been found to constitute a major conversion.

Although not addressed in reference (c), it is expected that replacement of a liftboat's jacking gear with equipment of a similar size will not constitute a major conversion.

4. Although it is intended that a vessel undergoing a major modification will lose its grandfather status and be brought into compliance with current regulations, the Coast Guard has always used common sense applying this standard to existing vessels. Reference (d) is a recent decision that ruled that the addition of a mid body to an existing OSV constituted a major conversion. Although the new midbody had to meet current regulations and the vessel had to comply with current subdivision and stability regulations, the application of existing standards to the remainder of the vessel was left to the discretion of the OCMI as reasonable and practicable. This policy is consistent with reference (e).

5. I hope that this letter clarifies those liftboat issues discussed during our meeting on 12 March 1998.


G. A. TETREAU
By direction

Dist: All Eight District Gulf Region MSO, MSU and MSDs

Copy: COMDT (G-MOC), (G-MSO)
Marine Safety Center
Offshore Marine Service Association